

ANGEL ENRIQUE NUNEZ ESCOBAR, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs.</i>	)	Civil Action No. 3:11-cv-994
	)	
<i>v.</i>	)	
	)	Judge Campbell/ Bryant
LEE GAINES, <i>et al.</i> ,	)	JURY DEMAND
	)	
<i>Defendants.</i>	)	
	)	
	)	

Plaintiffs, by their Counsel, and nonparty Immigrations and Customs Enforcement (“ICE”) (referred to herein as the “Parties to the Stipulation”), having agreed to entry of this Stipulated Order Regarding Attorneys Fees and Costs for the purpose of settling Plaintiffs’ Application for Fees and Expenses Under Fed.R.Civ.P. 37(b)(2)(c), Dckt. 271, it is HEREBY ORDERED, ADJUDGED, AND DECREED that:

2. Following the Court's ruling and pursuant to Fed.R.Civ.P. 37, Plaintiffs filed Plaintiffs' Application for Fees and Expenses Under Fed.R.Civ.P. 37(b)(2)(c), in the above-

captioned matter on July 3, 2013 ("Plaintiffs' Application for Fees"). Dckt. 271. ICE filed a Response to Plaintiffs' Application for Fees on August 1, 2013, Dckt. 276, and Plaintiffs filed a Reply in Further Support of the Application for Fees on August 22, 2013, Dckt. 282. The Parties to the Stipulation now wish to settle and compromise Plaintiffs' pending claim for attorney's fees and expenses.

3. In exchange for the promises contained in this Stipulation, ICE agrees to pay Plaintiffs' counsel, no later than September 27, 2013, the sum of \$75,000. ICE agrees that such payment shall be made by issuing checks to Plaintiff's counsel as follows: \$61,420.99 to Hughes Socol Piers Resnick & Dym, Ltd; \$9,313.79 to the ACLU Immigrants Rights Project; and \$4,265.22 to the Ozment Law Office.


4. Plaintiffs, by their counsel, will accept \$75,000 from ICE as full settlement and release of all claims for attorneys' fees and costs set out in the Application for Fees and Costs. This Stipulated Order does not discharge any claims Plaintiffs may have for any attorneys' fees and costs other than those fees and costs that are related to Plaintiffs' motion to compel production and motion for an order to show cause, which are specifically enumerated in Plaintiffs' Application For Fees. The Parties specifically agree that this Agreement does not in any way settle or compromise Plaintiffs' claims for attorneys' fees and costs otherwise incurred in the above-captioned matter.

5. By consent of the Parties to the Stipulation, the Court shall retain jurisdiction of this matter for the purpose of enforcing the terms of the Stipulated Order.

6. The person or persons executing this Stipulation for and on behalf of the respective Parties to the Stipulation represent that they have the full right, power and authority to bind said Parties to the Stipulation in and on their behalf.

7. This Stipulated Order shall be binding upon and inure to the benefit of the Parties to the Stipulation and their respective legal representatives, estates, trustees, successors and assigns.

ENTERED this 3<sup>rd</sup> day of September, 2013.

  
\_\_\_\_\_  
Hon. John S. Bryant  
United States Magistrate Judge

AGREED FOR ENTRY:

/s/ Cara Hendrickson  
\_\_\_\_\_  
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